

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JUDITH RÉ,

Plaintiff,

v.

JODI R.R. SMITH, and
BARNES & NOBLE INC.

Defendants.

Civil No. 04-11385-RGS

FILED
Clerk's Office
USDC, Mass.
Date 12-13-07
By MB
Deputy Clerk


AFFIDAVIT OF KIMBERLY FARRELL

I, KIMBERLY FARRELL, state the following on my own personal knowledge:

1. I am familiar with Judith Ré and her SOCIAL SAVVY® brand of etiquette instruction.
2. For the last several years I have assisted Ms. Re with her "Day of SOCIAL SAVVY" etiquette seminar that she regularly presents at the Ritz-Carlton, Boston. This work normally consists of helping Ms. Re with setting-up and presenting her classes.
3. On November 12, 2004 I visited the Barnes & Noble bookstore at the Prudential Center in Boston, Massachusetts. At the bookstore I spoke to a Barnes & Noble employee named Jennifer. I told Jennifer that I was looking for a book under the title SOCIAL SAVVY but was unsure of the author's name. Jennifer entered some information into a computer and gave me the name of Jodi R.R. Smith's books: The Girls Guide to Social Savvy and The Guy's Guide to Social Savvy. I asked Jennifer if Ms. Smith was the Social Savvy lady or if she ran etiquette seminars and she did not know. I then asked her if she saw any other author's books of a similar nature. Jennifer told me there were no other books.

4. On November 30, 2004 I visited the Barnes & Noble bookstore in Bellingham, Massachusetts. At the bookstore I spoke with a female Barnes & Noble employee. I could not understand the employee's name when she gave it to me. I again asked this employee about a book under the title SOCIAL SAVVY. The clerk immediately directed me to Ms. Re's book: SOCIAL SAVVY. I mentioned that I wanted to be sure that this was the women who taught etiquette classes. The female employee told me that she believed Ms. Re was the one who taught the SOCIAL SAVVY classes.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 13 DAY OF
December, 2004.


Kimberly Farrell